



June 25, 2013

*Submitted Electronically*

Missouri Department of Natural Resources  
Air Pollution Control Program  
Air Quality Section/Air Monitoring Unit  
P.O. Box 176  
Jefferson City, MO 65102

**Subject: Proposed Changes to 2013 Monitoring Network Plan**

City Utilities of Springfield, Missouri would like to submit comments on the proposed changes to MDNR's 2013 Monitoring Network Plan. City Utilities is a municipally owned public utility providing electric, natural gas, water, transportation, and broadband services within the Springfield metropolitan area. CU serves approximately 110,000 electric customers, 83,000 natural gas customers, 80,000 drinking water customers, 1,500,000 annual public transit patrons, and 789 commercial broadband customers. CU owns and operates two coal-fired power plants and seven combustion turbine generators. Our total generating capacity is slightly over 1,100 Megawatts. CU owns and operates two drinking water treatment plants with a total capacity of 109 million gallons per day. Our primary water supply is derived from three surface impoundments and a riverbank intake. These are supplemented by groundwater from three deep wells and a perennial spring.

**I. Summary of comments on the proposed Network Plan changes**

- a. We support MDNR's decision to **request discontinuation of the Wildwood industrial ambient SO<sub>2</sub> monitor located in the Springfield-Greene County area.** The Plan retains two (2) monitors strategically located to assess SO<sub>2</sub> concentrations in the surrounding community protective of the National Ambient Air Quality Standards (NAAQS).
- b. We agree with MDNR this approach will **reduce redundancy and provide more efficient and productive use of limited manpower and financial resources.**

**II. Specific issues:**

- a. **Discontinuation of the Wildwood industrial ambient SO<sub>2</sub> monitoring site is appropriate and supported by monitored data.**
  - i. Since 2003, design values at Wildwood are consistently below the James River-South monitoring site, located approximately 289 meters to the south.

- ii. Except for the most recent three year period, Figure 2.1a shows a minimum 6 ppb difference between the monitor design values at Wildwood versus James River-South sites.
  - iii. The 2006-2008 Wildwood design concentration is 25 ppb less than the James River-South concentration.
  - iv. Between 2008 and 2010, Wildwood reported one concentration out of the 300 highest hourly values greater than the highest monitored concentration recorded from both locations.
  - v. Since 2012, neither the Wildwood nor James River-South monitoring sites recorded a single exceedance of the 1-hour SO<sub>2</sub> standard.
  - vi. Reported first quarter 2013 ambient concentrations are 39% below the 75 ppb standard.
- b. Redundancy maintains monitoring network integrity and shifts resources to areas of greater need.***
- i. The South Charleston (54) and James River-South (68) ambient monitoring locations will continue to be maintained and quality assured for the foreseeable future.
  - ii. Resources can be diverted to other monitoring locations and used to perform quarterly assessments at each location. Confidence in measurement results leads to increased monitoring network integrity.

### **III. Further Contacts**

City Utilities appreciates the opportunity to provide comments to the Monitoring Network Plan revisions in support of MDNR's efforts. If additional information or clarification is required, please do not hesitate to contact us by telephone at 417.831.8916 or electronic mail at [daniel.hedrick@cityutilities.net](mailto:daniel.hedrick@cityutilities.net).

Respectfully,



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